

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CRIMINAL NO.
	: 1:01-CR-131
v.	:
	:
SYNEDO MICHAEL WILLIAMS	: (Judge Rambo)
	: Electronically Filed

**UNOPPOSED MOTION FOR EXTENSION  
OF TIME FOR PROBATION TO RESPOND TO  
DEFENDANT'S OBJECTIONS TO HIS PRE-SENTENCE REPORT**

**AND NOW**, this 20<sup>th</sup> day of August, 2007, comes the above-captioned Defendant, Synedo Michael Williams, by and through his counsel, Robert J. Daniels, Esquire, and respectfully requests this Honorable Court grant an extension of time in the above-captioned matter, and in furtherance thereof avers the following:

1. The Pre-Sentence Report in the above-captioned case is an expansive document that includes references to several dozen individuals and involves a sophisticated criminal enterprise.
2. On June 5, 2007, Defendant submitted lengthy factual clarifications and objections to his Pre-Sentence Report.
3. On June 5, 2007, undersigned counsel sent correspondence to U.S. Probation Officer Vought in an attempt to resolve outstanding factual issues before the submission of a Supplemental Report to this Honorable Court.

4. It is believed, and therefore averred, the resolution of the outstanding factual issues prior to the submission of a Supplemental Report would narrow the issues presented to this Honorable Court for review and thus promote judicial economy.

5. It is believed, and therefore averred, said request falls under the umbrella of the resolution of factual issues as contemplated in F.R.Cr.P. 32(f)(3).

6. Undersigned counsel met with Assistant U.S. Attorney Christy Fawcett and many of the factual issues were resolved. However, to date, the factual resolutions have not been submitted to the United States Probation Office.

7. Undersigned counsel spoke with Probation Officer Vought who will be on vacation for a portion of the week the objections are due, and therefore, would be unable to assimilate the information into a Supplemental Report.

8. We all concur in an additional ten (10) day extension to confer and narrow the issues for this Honorable Court to consider.

**WHEREFORE**, it is respectfully requested that a ten (10) day extension of time be granted for the Probation Office to respond to Defendant's objections to his Pre-Sentence Report in the above-captioned matter.

Respectfully submitted,

KILLIAN & GEPHART, LLP

Dated: August 20, 2007

s/ Robert J. Daniels  
Robert J. Daniels, Esquire  
Attorney I.D. #83376  
218 Pine Street  
P. O. Box 886  
Harrisburg, PA 17108-0886  
(717) 232-1851

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**CERTIFICATE OF CONCURRENCE**

The undersigned has contacted Assistant U.S. Attorney Christy Fawcett, who has indicated that she concurs in this Motion For Extension Of Time.

Respectfully submitted,

KILLIAN & GEPHART, LLP

Dated: August 20, 2007

s/Robert J. Daniels  
Robert J. Daniels, Esquire  
Attorney I.D. #83376  
218 Pine Street  
P. O. Box 886  
Harrisburg, PA 17108-0886  
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**CERTIFICATE OF SERVICE**

I, Robert J. Daniels, of the law firm of Killian & Gephart, do hereby certify that I forwarded a true and correct copy of the attached Unopposed Motion For Extension Of Time by the Middle District Court's Electronic Filing System on August 20, 2007, to the following:

Christy Fawcett, Esquire  
Assistant U.S. Attorney  
U.S. Department of Justice  
228 Walnut Street, Suite 220  
P.O. Box 11754  
Harrisburg, PA 17108-1754

Mr. John Vought  
Federal Probation Officer  
Federal Building  
P.O. Box 11754  
228 Walnut Street  
Harrisburg, PA 17108-1754

Respectfully submitted,

Dated: August 20, 2007

/s/ Robert J. Daniels  
Robert J. Daniels, Esquire  
Attorney ID #83376  
**Killian & Gephart**  
218 Pine Street  
Harrisburg, PA 17108  
(717) 232-1851